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6 Attorney for Plaintiff

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

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10 ZORICA LONCAR, )  
vs. ) Plaintiff, ) Case No.: 2:13-cv-02218-JAD-GWF  
11 )  
12 )  
13 )  
14 )  
15 )  
16 )

PENN NATIONAL GAMING, INC., a )  
Pennsylvania Corporation and Registered )  
Nevada Foreign Corporation; LV GAMING )  
VENTURES, LLC, a Nevada Limited Liability )  
Company; DOES I through X; and ROE )  
BUSINESS ENTITIES I through X, inclusive, )

17 **STIPULATION AND ORDER TO**  
**EXTEND TIME FOR PLAINTIFF TO**  
**RESPOND TO DEFENDANT'S**  
**MOTION FOR SUMMARY JUDGMENT**  
18 **[SECOND REQUEST]**

19 Defendants. )

20 It is hereby stipulated by and between the parties, through their respective counsel, that Plaintiff,  
21 ZORICA LONCAR, (hereinafter referred to as "Plaintiff"), shall have a further extension from Friday,  
22 January 23, 2015 to and including Friday, January 29, 2015, in which to file her Response to Defendants'  
23 Motion for Summary Judgment. This stipulation is submitted and based upon the following:

24 1. That Plaintiff's counsel has requested this extension of time and has informed  
25 Defendants' counsel that such an extension is necessary because counsel for Plaintiff  
26 has been experiencing difficulty coordinating schedules and time to meet with his client  
27 to work on the Response due in part to the recent Christmas and New Year holiday  
28 period.

2. Additionally, Plaintiff's counsel had several other matters including several depositions

1 including three out of state depositions that required more time than anticipated to  
2 prepare for and attend, as well as several motions to respond to in other matters since  
3 the time of the prior extension. Thus Plaintiff's counsel has been unable to devote the  
4 necessary time to this matter and another short extension would be appreciated.  
5

6 3. That this request for an extension of time for Plaintiff to file his Response to  
7 Defendants' above referenced Motion for Summary Judgment is made in good faith and  
8 not for purpose of delay.  
9

DATED this 21<sup>st</sup> day of January, 2015.

10 /s/ James P. Kemp

11 James P. Kemp, Esq.  
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/s/ Anthony B. Golden

17 Scott M. Mahoney, Esq.  
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22 Attorneys for Defendant

23 **IT IS SO ORDERED**

24   
25 U.S. DISTRICT COURT JUDGE

26 Dated: January 23, 2015